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April 24, 2008

BY FACSIMILE & ECF
Hon. Shira A. Scheindlin
United States District Judge
Southern District of New York
500 Pearl Street
New York, N.Y. 10007

Re: United States v. John Melicharek
Client: Michel Iuni
07 Cr. 907 (SAS)

Dear Judge Scheindlin:

Please accept this letter as a request to modify the conditions of release for Michael Iuni so as to facilitate his attending the annual diner dance on May 10, 2008 for the Iron Workers Union, Local 45 of which Mr. Iuni is a member. He would attend the dance accompanied by his brother, wife and sister, two of whom are signatories upon his bond.

On October 23, 2007 following hearing the court granted bail to Michael Iuni with conditions of release which included the following: \$1,000,000.00 PRB secured by parents home and signed by defendant's parents, brother and sister; home detention with electronic monitoring; defendant to reside with his parents at his parent's home ; voluntary out-patient drug treatment; defendant to travel to drug treatment program only."

It is proposed that Mr. Iuni's electronic monitoring be turned off between 5:00 P.M.-1:00 A.M. to permit him to attend the annual event. I enclose a copy of a letter from James Kearney, Business Representative for Local 45 concerning the request.

It is respectfully requested that Mr. Iuni's conditions of release be modified to permit him to leave his residence to attend to this annual event. I have spoken with AUSA Elie Honig and Pre-trial Officer Scott Kowal and both consent to his modification.

Respectfully submitted,



Alan Nelson

cc: AUSA Elie Honig (ECF)

International Association

PAT DRUM
President

OF BRIDGE, STRUCTURAL, ORNAMENTAL
AND REINFORCING IRON WORKERS, LOCAL NO. 45

JAMES KEARNEY
Business Representative

Affiliated with A. F. of L.

WILLIAM KEARNEY
Recording Secretary

558 NEWARK AVENUE • JERSEY CITY, N.J. 07306

Phone: 201-653-3365; 201-653-3705

JAMES KEARNEY, JR.
Fin. Sec'y & Treasurer



April 8, 2008

To whom it may concern,

Michael Iuni would like to attend our annual dinner dance on May 10, 2008 at The Westmount Country Club on Rifle Camp Road in West Paterson, NJ. The Affair will Begin at 630pm and last until midnight.

Fraternally yours,

James Kearney Jr
FST